

ACORN PROPERTY GROUP
REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19
CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP

INTRODUCTION

Acorn Property Group is a very well-established, locally based housing developer and land promoter with interests across the district.

Acorn Property Group has helped to facilitate new homes, affordable housing and other uses in the area. They are an independent development and regeneration specialist that has, successfully created a range of residential-led refurbishment and new build schemes.

Specifically, Acorn Property Group has interests in land at Hillhead, Colyton, which is an allocated site in the Emerging Local Plan which is suitable for residential development. We attach a plan that shows this land (please refer to the Appendix A document) submitted.

Given the nature of their long-standing delivery of housing in the district, Acorn Property Group is an important local stakeholder within interests in the proposals in the East Devon Local Plan for future development in the district.

Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 -2042) Regulation 19 Consultation Draft and makes the following representations.

CHAPTER 8: MEETING HOUSING NEEDS

Strategic Policy HN02: Affordable Housing

Strategic Policy HN02 sets out the Council’s proposed approach to the provision of affordable housing as part of new development. In summary, it proposes that affordable housing be provided on housing schemes of six or more dwellings in designated rural areas and 10 or more in non-designated rural areas.

The amount of affordable housing to be sought is to vary according to location. For most allocated sites, including the land which is of interest to our client at Hillhead, Colyton, the policy seeks 30% affordable housing. Subject to further testing, Acorn Property Group could support the approach in Policy HN02 which would require this level of provision.

However, we note that Core Submission Document CSD-04 (East Devon Local Plan Viability Assessment) suggests that with the exception of Axminster, 35% affordable housing is generally viable on allocated sites, but that 30% affordable requirement for allocations outside the West End and

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Budleigh Salterton-Sidmouth/Sidford (such as Colyton) provides additional viability headroom to meet additional costs.

A precautionary approach to viability is important and important to give developers flexibility and room to manoeuvre in an uncertain market – a variety of issues have affected the housing market in the last five years including post pandemic effects and other economic shocks and which collectively have substantially increased borrowing and construction costs. It is well recognised that these impacts, along with much the increased technical requirements (notably in relation to, for example, biodiversity net gain and flood risk) and significant delays in the planning process have had direct effects on the viability of housing schemes.

However, in order to achieve the level of affordable housing set out in the policy, it is critical that it is demonstrably viable to do so. It is unclear whether the Local Housing Need Assessment which underpins the Local Plan is supported by any viability assessment, and given the proposed affordable housing targets are generally higher than the requirements in the current Local Plan, it is essential that this is tested through detailed viability. This should be done before examination to avoid delays during the examination (taking the lessons learned from the viability sessions of the Cranbrook Plan DPD as an example).

At present, it is unclear whether sufficient testing has been undertaken to confirm the thresholds of affordable housing set out are viable and further infrastructure costings required to ensure the LPA have a robust position.